

August 4, 2008

US Securities & Exchange Commission  
Attn: Nancy N. Norris, Secretary  
SEC Headquarters  
100 F Street, NE  
Washington, DC 20549

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SEC. OF TREAS.

Subject: SEC Review of Rule 12b-1

As a financial advisor with 15 years experience, I am privileged to service and provide financial advice to over 1000 households. I have read all of the arguments both for and against the 12b-1 fees. It is my belief that although the fees are not being utilized as originally intended, they are an extremely important, vital part of the financial advisor profession. I have chosen to explain 12b-1 fees as "service fees" to my clients. Clients understand service fees are compensation to my self, as well as my staff, for continuous service and care of their financial needs. I have chosen to utilize C shares to economically justify service of our smaller accounts.

It is my suggestion to leave all service fees (12b-1) as they are and require firms to disclose the fees on a brokerage statement, just as they would a standard commission. I have found that my clients understand the fees and have no problem paying, knowing that I am providing them an important service. By requiring full disclosure, you are reminding clients of the fees existence. The responsibility is then given to the client to determine if they are receiving the services worthy of the fees paid. We should remember that clients always have the choice of with whom they will do business. Clients also have the right to know the costs, therefore simply disclose the fees.

Sincerely,



Patrick K. Elmore  
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